



THE CITY OF NEW YORK
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June 27, 2023

By ECF

Honorable Ronnie Abrams
United States District Court
Southern District of New York
40 Foley Square, Room 2203
New York, New York 10007

Re: Don Sagesse v. City of New York, et al., 22-CV-8414 (RA)

Your Honor:

I am an Assistant Corporation Counsel in the Office of the Honorable Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York, and the attorney for defendant the City of New York in the above-referenced action. Defendant writes to respectfully request an 11-day enlargement of time to file its motion for summary judgment, from June 29, 2023, until July 10, 2023. This is the first request for an extension of this deadline, and plaintiff consents to this application.

On May 31, 2023, the Court entered a briefing schedule which ordered that defendant was to file its motion for summary judgment by June 29, 2023, plaintiff was to oppose by July 28, 2023, and defendant was to reply by August 18, 2023. ECF No. 13. Defendant requires additional time to finalize and file its motion due to the undersigned completing jury service in Kings County Supreme Court earlier this week and other commitments this week, including a deposition tomorrow and a personal appointment on Thursday morning. The proposed revised briefing schedule also accounts for an upcoming vacation of the undersigned, from Friday, June 30th – Wednesday, July 5th.

Accordingly, defendant respectfully requests an extension of time to file its motion for summary judgment and that the Court enter the following revised briefing schedule:

Defendant's Motion served and filed:	July 10, 2023
Plaintiff's Opposition served and filed:	August 8, 2023
Defendant's Reply served and filed:	August 22, 2023

Defendant thanks the Court for its time and consideration of this application.

Respectfully submitted,

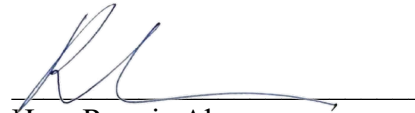
Evan J. Gottstein /s/

Evan J. Gottstein
Assistant Corporation Counsel
Special Federal Litigation Division

cc: Via ECF
Alex Padilla, Esq.
Attorney for Plaintiff

Application granted.

SO ORDERED.



Hon. Ronnie Abrams
June 28, 2023